



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

June 21, 2004

Certified Mail No. 7099 3220 0009 1975 4007

Mr. Alan L. Prouty
Director, Environmental and Regulatory Affairs
J.R. Simplot Co.
P.O. Box 27
Boise, ID 83707-0027

RE: Facility ID No. 027-00009, J.R. Simplot Co., Caldwell
Final Tier I Operating Permit

Dear Mr. Prouty:

The Department of Environmental Quality (DEQ) is issuing modified Tier I Operating Permit No. T1-030015 to the J.R. Simplot Co. for their Caldwell facility in accordance with IDAPA 58.01.01.300 – 386 *Rules for the Control of Air Pollution in Idaho*. The enclosed permit is effective immediately and is based on the information contained in your permit application, received January 13, 2003.

Tim Trumbull of the Boise Regional Office will contact you regarding a meeting to discuss the permit terms and requirements. DEQ recommends the following representatives attend this meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of the decision. However, prior to filing a petition for a contested case, DEQ encourages you to contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us to discuss any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Martin Bauer".

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd

Permit No. T1-030015

Enclosures

c: Tim Trumbull, Boise Regional Office
Laurie Kral, EPA Region 10

bc: Sherry Davis, Source File
Bill Rogers, Permit Coordinator
Marilyn Seymore/Pat Rayne, AFS
Joan Lechtenberg, Public Comment
Permit Binder
Phyllis Heitman (Ltr Only)
Reading File, (Ltr Only)



Air Quality
Tier I Operating Permit
State of Idaho
Department of Environmental Quality

PERMIT No.: T1-030015
FACILITY ID No.: 027-00009
AQCR: 64 **CLASS:** A
SIC: 2037 **ZONE:** 11
UTM COORDINATE (km): 521.5 , 4835.0

1. PERMITTEE
J.R. Simplot Co., Food Group

2. PROJECT
Tier I Operating Permit

3. MAILING ADDRESS P.O. Box 1059	CITY Caldwell	STATE ID	ZIP 83606
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4. FACILITY CONTACT Bill Rutherford	TITLE Environmental Manager	TELEPHONE (208) 454-4360
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5. RESPONSIBLE OFFICIAL Reggie Pederson	TITLE Unit Director	TELEPHONE (208) 454-4201
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6. EXACT PLANT LOCATION Two miles west of Caldwell on Highway 19	COUNTY Canyon
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7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Potato processing/Ethanol production

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

This permit replaces Tier I Operating Permit No. 027-00009, dated October 4, 2002, the terms and condition of which no longer are in effect.

The effective date of this permit is the date of signature by the DEQ on the cover page.

J.R. Sandoval

J.R. Sandoval
Chief of Staff

C. STEPHEN ALLRED, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: June 21, 2004

DATE EXPIRES: October 4, 2005

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
COD	chemical oxygen demand
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
HAPs	hazardous air pollutants
H ₂ S	hydrogen sulfide
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/mo	pounds per month
O&M	operations and maintenance
MMBtu/hr	million British thermal units per hour
mmHg	millimeters of mercury
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₂	oxygen
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of ten micrometers or less
ppmv	parts per million by volume
PTC	permit to construct
PW	process weight
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/day	tons per day
T/mo	tons per month
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound
VOL	volatile organic liquid

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-030015

Permittee:	J.R. Simplot Co.	Facility ID No. 027-00009	Date Issued:	June 21, 2004
Location:	Caldwell, Idaho		Date Expires:	October 4, 2005

1. TIER I OPERATING PERMIT SCOPE***Purpose***

- 1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the *Rules for the Control of Air Pollution in Idaho*.
- 1.2 This Tier I permit incorporates the terms and conditions of the consent order and PTCs listed below and replaces the Tier I operating permit listed below:
- Consent Order, October 7, 1999
 - PTC No. 027-00009, December 31, 1997
 - Tier I Operating Permit No. 027-00009, dated October ~~24~~, 2002
 - PTC No. P-030013, October 17, 2003
 - PTC No. P-030014, October 17, 2003

Regulated Sources

- 1.3 Table 1.1 lists the emissions sources regulated in this Tier I operating permit.

Table 1.1 EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Production Lines No. 1, 4, and 6	Wet ESPs / None
4	Steam Generating Plant	None
5	Heater S-C-H5	None
6	Biogas Unit	Flare
7	Ethanol Production Plant	None
8	Ethanol Storage Tanks	None

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2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1 FACILITY-WIDE APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
2.1	Fugitive emissions	Reasonable control and fugitive dust plan	IDAPA 58.01.01.650-651, PTC No. P-030014	2.2, 2.3, 2.4, 2.25, 2.26
2.5	Odors	No emissions of odorous gas, liquids, or solids	IDAPA 58.01.01.775-776	2.6, 2.25, 2.26
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.25, 2.26
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9.1-2.9.5, 2.25, 2.26
2.10	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.10, 2.25
2.11	Renovation and demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.11, 2.25
2.12	Chemical accident prevention	Compliance with 40 CFR 68	40 CFR 68	2.12, 2.25
2.13	Fuel sulfur content	ASTM Grade 1 fuel oil – 0.3% by weight; ASTM Grade 2 fuel oil – 0.5% by weight	IDAPA 58.01.01.728	2.13, 2.25
2.14	Fuel- burning equipment	Compliance with IDAPA 58.01.01.676-677	IDAPA 58.01.01.676-677	2.14, 2.25
2.15	Recycling and emissions reduction	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.15, 2.25

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Precautions used to provide reasonable control of fugitive emissions will be described in a fugitive dust control plan that is developed, implemented, and maintained by the permittee at the facility at all times and made available to DEQ representatives upon request. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.

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- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

[IDAPA 58.01.01.650-651, 5/1/94; PTC No. P-030014, 10/17/03]

- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. The fugitive emissions inspection shall consist of a see/no see evaluation of each potential source. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (State-only), 5/1/94]

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Visible Emissions

- 2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential point sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation of each potential source. If any visible emissions are present from any point of emission, the permittee shall take appropriate corrective action as expeditiously as practicable. If the corrective action does not eliminate the visible emissions, then a Method 9, or Method 22 in the case of the flare, visible emissions observation must be conducted as soon as possible, but in no case later than 48 hours after the failure of the corrective action to remedy the visible emissions. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the subsections of Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event, to reduce the frequency of occurrence of such events, to minimize the amount by which the emission standard is exceeded, and shall, as provided below or upon request of DEQ, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

- 2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

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- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory have been declared by DEQ.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emission event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Facility-wide Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

- 2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

- 2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Facility-wide Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

- 2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03, 4/5/00]

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- 2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

- 2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request. The excess emissions records shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, and safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00]

(state-only; federally enforceable upon approval into the SIP);

IDAPA 58.01.01.322.08.b, 3/23/98]

Open Burning

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Renovation/Demolition

- 2.11 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.12 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance is present above a threshold quantity is first listed under 40 CFR 68.130.

- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10(a)]

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Sulfur Content

2.13 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight
- ASTM Grade 2 fuel oil - 0.5% by weight

[IDAPA 58.01.01.728, 5/1/94]

Fuel-burning Equipment

2.14 Unless specified elsewhere in the permit, the following shall apply to fuel-burning equipment at the facility:

- For fuel-burning equipment commencing operation on or after October 1, 1979, with a rated input of 10 MMBtu/hr or more, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676, 5/1/94]

- For fuel-burning equipment commencing operation prior to October 1, 1979, or with a rated input less than 10 MMBtu/hr, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.100 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.677, 5/1/94]

Recycling and Emissions Reductions

2.15 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

New Source Performance Standards

The following conditions apply to each NSPS source at the facility:

2.16 All requests, reports, applications, submittals, and other communications to the Administrator pursuant to 40 CFR 60, shall be submitted in duplicate to the EPA Region 10, Director of the Office of Air Quality. All information required to be submitted to the EPA for applicable NSPS requirements, must also be submitted to DEQ.

[40 CFR 60.4]

2.17 A notification of any physical or operational change to an existing facility that may increase the emissions rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days,

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or as soon as practicable, before the change is commenced and shall include information describing the precise nature of the change, present and proposed emissions control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

[40 CFR 60.7(a)(4)]

- 2.18 Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

- 2.19 The opacity standards set forth in this part shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

[40 CFR 60.11(c)]

- 2.20 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

- 2.21 For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[40 CFR 60.11(g)]

- 2.22 No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard, that is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[40 CFR 60.12]

- 2.23 A change to an existing facility may constitute a modification or reconstruction as described in 40 CFR 60.14 and 15, respectively. The source can request a determination of reconstruction or modification as described in 40 CFR 60.5.

[40 CFR 60.5, 14, 15]

Compliance Testing

- 2.24 If testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit for approval to DEQ, in writing, at least 30 days in advance, the following:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit a report to DEQ for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239

Telephone: (208) 373-0550 Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Monitoring and Recordkeeping

- 2.25 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to, the following information: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Reports and Certifications

- 2.26 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-030015

Permittee:	J.R. Simplot Co.	Facility ID No. 027-00009	Date Issued:	June 21, 2004
Location:	Caldwell, Idaho		Date Expires:	October 4, 2005

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239

The periodic compliance certification required by General Provision 21 shall also be submitted to the EPA within 30 days of the end of the specified reporting period, at the following address:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-030015

Permittee:	J.R. Simplot Co.	Facility ID No. 027-00009	Date Issued:	June 21, 2004
Location:	Caldwell, Idaho		Date Expires:	October 4, 2005

3. EMISSIONS UNIT/PRODUCTION LINES NO. 1, 4, AND 6

Summary Description

The following is a narrative description of the No. 1, 4, and 6 production lines regulated in this Tier I operating permit. This description is for informational purposes only. The Line No. 1 fryer was initially permitted as the Line No. 5 fryer in PTC No. 027-00009, dated December 31, 1997, and will be referred to as Line No. 1 throughout this operating permit unless otherwise noted.

The plant has three processing lines (No. 1, 4, and 6) located in Plant 2, each equipped with a blancher, a dryer, and a fryer. The Line No. 1 dryer and fryer were installed in 1995 and 1998, respectively; Line No. 4 dryer and fryer were installed in 1972 and 1970, respectively; and Line No. 6 dryer and fryer were installed in 1968 and 1970, respectively. The rated capacities of the Line No. 1, 4 and 6 dryers are 5.5, 16, and 28 MMBtu/hr, respectively. The rated capacities of the Line No. 1, 4, and 6 fryers are 75,000; 260,000; and 270,000 pounds per eight-hour shift, respectively. Each dryer is typically one large unit that is vented directly to the atmosphere. The fryers are primarily vented to a wet electrostatic precipitator. Table 3.1 lists the unit numbers associated with each unit.

Table 3.1 EMISSIONS UNIT IDENTIFICATION NUMBERS

Production Line No. 1		Production Line No. 4		Production Line No. 6	
Dryer	Fryer	Dryer	Fryer	Dryer	Fryer
S-C-D1	S-C-F1	S-C-D4	S-C-F4	S-C-D6	S-C-F6

Table 3.2 below describes the devices used to control emissions from production line fryers 1, 4, and 6.

Table 3.2 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Unit(s) / Process(es)	Emission Control Device
Production Line No. 1 fryer	Wet ESP
Production Line No. 4 fryer	Wet ESP
Production Line No. 6 fryer	Wet ESP

Table 3.3 contains a summary of the requirements that apply to the No. 1, 4, and 6 production lines.

Table 3.3 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1, 3.2	PM	Process weight	IDAPA 58.01.01.701-702	None required
3.3	PM (line No. 1)	10.88 lb/hr and 47.65 T/yr	PTC No. 027-00009	3.13, 3.14, 3.18
3.4	Visible emissions (line No. 1)	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, PTC No. 027-00009	3.15, 3.16
3.5	Throughput (line No. 1)	41,908 T/yr in any consecutive 12-month period	PTC No. 027-00009	3.11, 3.16
3.8	Pressure drop	Within 30% of most recent performance test	PTC No. 027-00009	3.12, 3.16, 3.17
3.9	Scrubber flow rate	Within 30% of most recent performance test	PTC No. 027-00009	3.12, 3.16, 3.17

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Permit Limits / Standard Summary

- 3.1 None of the Line No. 4 and Line No. 6 dryers or fryers shall emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour (lb/hr), and PW is the process weight in pounds per hour :

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 3.2 The Line No. 1 dryer or fryer shall not emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

- 3.3 The PM emissions from the line No. 1 fryer stack shall not exceed 10.88 lb/hr or 47.65 T/yr.

[PTC No. 027-00009, 12/31/97]

- 3.4 For line No. 1 fryer, the permittee shall comply with Permit Condition 2.7

[PTC No. 027-00009, 12/31/97]

- 3.5 The maximum throughput of preformed potato product to the Line No. 1 fryer shall not exceed 41,908 T/yr, measured as finished product, in any consecutive 12-month period.

[PTC No. 027-00009, 12/31/97]

- 3.6 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.

[PTC No. 027-00009, 12/31/97]

- 3.7 In accordance with PTC No. 027-00009, dated December 31, 1997, the permittee shall have developed an O&M manual for the air pollution control device which describes the procedures that will be followed to maintain good working order and assure operation as efficiently as practical, and in accordance with Permit Conditions 3.8 and 3.9. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. 027-00009, 12/31/97]

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- 3.8 The pressure drop across the air pollution control device shall not be below 30% of the lowest pressure drop reading measured during the most recent performance test that demonstrated compliance with this permit and the O&M manual operating pressure drop (loss or gain) specifications.
[PTC No. 027-00009, 12/31/97]
- 3.9 The scrubbing media flow rate to the air pollution control device shall not be below 30% of the lowest flow rate measured during the most recent performance test that demonstrated compliance with this permit and the O&M manual's scrubbing media flow rate specifications.
[PTC No. 027-00009, 12/31/97]
- 3.10 The Line No. 1, 4, and 6 dryers shall be fired by natural gas exclusively.
[IDAPA 58.01.01.322.01, 3/19/99]

Monitoring & Recordkeeping Requirements

- 3.11 The permittee shall monitor and record the throughput to the Line No. 1 fryer, measured as finished product, once per month. This information shall be recorded as tons per month (T/mo). The throughput records shall be kept at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.
[PTC No. 027-00009, 12/31/97; Consent Order, 10/7/99]
- 3.12 The permittee shall monitor and record the pressure drop and scrubbing media flow rate of the air pollution control device once per week. The pressure drop and scrubbing media flow rate records shall be kept at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.
[PTC No. 027-00009, 12/31/97; Consent Order, 10/7/99]
- 3.13 Prior to October 3, 2003, the permittee shall conduct a compliance test for PM emissions in the Line No. 1 fryer exhaust gas stream as specified in Permit Condition 2.24. The permittee shall monitor and record the throughput of the Line No. 1 fryer during the test.
[PTC No. 027-00009, 12/31/97]
- 3.14 If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission rate limits in Permit Condition 3.4, no further testing shall be required during the permit term. If the PM emission rate measured during the initial compliance test is greater than 75%, but less than or equal to 90% of the emission rate limit in Permit Condition 3.4, a second test shall be required between October 4, 2004 and October 3, 2005. If the PM emission rate measured during the initial compliance test is greater than 90% of the PM emission rate limit in Permit Condition 3.4, the permittee shall conduct a compliance test annually.
[IDAPA 58.01.01.322.06, 09, 5/1/94]
- 3.15 For the Line No. 1 fryer, the permittee shall comply with Permit Condition 2.8.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Reporting

- 3.16 Beginning on October 4, 2002, the permittee shall submit a summary compliance report to DEQ every six months for the monitoring required in Permit Conditions 3.11, 3.12, and 3.15. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.
[IDAPA 58.01.01.322.08, 11, 4/5/00]

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- 3.17 The permittee shall submit monthly reports to DEQ of occurrences when the measurements of the pressure drop and scrubbing media flow rate of the air pollution control equipment are less than 30% of the lowest values obtained during the most recent compliance test that demonstrated compliance with this permit.

[PTC No. 027-00009, 12/31/97]

- 3.18 The permittee shall report the results of the compliance test required in Permit Condition 3.13 to DEQ in a written report to be received no later than 30 days after completion of the test. If additional performance testing is performed in accordance with Permit Condition 3.14, the permittee shall report the results to DEQ and EPA in a written report to be received no later than 30 days after completion of the test.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

- 3.19 All documents, including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[PTC No. 027-00009, 12/31/97]

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4. EMISSIONS UNIT/STEAM GENERATING PLANT**Summary Description**

The following is a narrative description of the steam generating plant regulated in this Tier I operating permit. This description is for informational purposes only.

The steam generating plant consists of three natural gas-fired boilers that supply steam to the potato processing plant and the ethanol plant. The Kewanee boiler (Unit No. S-C-B8) was installed in 1966 and has a rated capacity of 80.8 MMBtu/hr. The remaining two boilers are both Cleaver-Brooks boilers with rated capacities of 102.8 MMBtu/hr. The first Cleaver-Brooks boiler (Unit No. S-C-B9) was installed in 1969, and the second Cleaver-Brooks boiler (Unit No. S-C-B10) was installed in 1972. There are currently no control devices on the boilers.

Table 4.1 contains a summary of the requirements that apply to the steam generating plant.

Table 4.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit /Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
4.1	PM	0.015 gr/dscf at 3% oxygen	IDAPA 58.01.01.677	4.2
4.2	Fuel type	Natural gas only	IDAPA 58.01.01.322.01	2.25

Permit Limits / Standard Summary

- 4.1 A person shall not discharge to the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, PM in excess of 0.015 gr/dscf corrected to 3% oxygen.

[IDAPA 58.01.01.677, 5/1/94]

- 4.2 The three boilers shall be fired by natural gas exclusively.

[IDAPA 58.01.01.322.01, 3/19/99]

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Permittee:	J.R. Simplot Co.	Facility ID No. 027-00009	Date Issued:	June 21, 2004
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5. EMISSIONS UNIT/HEATER S-C-H5***Summary Description***

The following is a narrative description of the heater regulated in this Tier I operating permit. This description is for informational purposes only.

There is one natural gas-fired heating unit (S-C-H5) used to heat the plant that does not qualify as an insignificant activity. This heater has a rated capacity of 10.1 MMBtu/hr and was installed on January 15, 1991. Emissions from the heaters are released to the atmosphere through room vents. Combustion emissions for the heaters are based on continuous operation at burner capacity, assuming all emissions are released to the atmosphere.

Table 5.1 contains a summary of the requirements that apply to the heater.

Table 5.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
5.1	PM	0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.676	5.2
5.2	Fuel type	Natural gas only	IDAPA 58.01.01.322.01	2.25

Permit Limits / Standard Summary

- 5.1 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation on or after October 1, 1979, with a maximum rated input equal to or exceeding 10 MMBtu/hr, PM in excess of 0.015 gr/dscf corrected to 3% oxygen.

[IDAPA 58.01.01.676, 5/1/94]

- 5.2 The heater shall be fired by natural gas exclusively.

[IDAPA 58.01.01.322.01, 3/19/99]

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6. EMISSIONS UNIT/BIOGAS UNIT

Summary Description

The following is a narrative description of the biogas unit regulated in this Tier I operating permit. This description is for informational purposes only.

Gases produced by the ADI-BVF anaerobic digester at the wastewater treatment facility are referred to as biogases. The biogas primarily consists of methane, carbon dioxide, and hydrogen sulfide (H₂S). These gases are collected and routed to a waste flare (Unit No. S-C-BF) equipped with a natural gas-fired pilot light. The flare combusts the biogas to form carbon dioxide, sulfur dioxide, and water, which are vented to the atmosphere. The ADI-BVF anaerobic digester and biogas flare were initially permitted for construction in PTC No. 027-00009, dated December 17, 1997. The PTC was amended on December 10, 2001, and was later incorporated into PTC No. P-030014, dated October 17, 2003, as a permit revision.

Table 6.1 contains a summary of the requirements that apply to the biogas unit.

Table 6.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
6.1	SO ₂	Not to exceed 90.0 T/yr	PTC No. P-030014	6.8, 6.13
6.2	H ₂ S	Not to exceed 5391 ppmv	PTC No. P-030014	6.10, 6.11, 6.14
6.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; PTC No. P-030014	6.12, 6.13
6.4	COD	COD reduction in the digester shall not exceed 2,000,000 lb/mo	PTC No. P-030014	6.8, 6.13
6.5	Flare operation	Flare shall be operated with pilot flame	PTC No. P-030014	6.9, 6.13
6.7	PM	0.2 lb PM/100 lb of biogas burned	IDAPA 58.01.01.786.01	6.12, 6.13

Permit Limits / Standard Summary

- 6.1 Sulfur dioxide emissions from the ADI-BVF digester flare stack shall not exceed 90.0 T/yr.
[PTC No. P-030014, 10/17/03]
- 6.2 The H₂S concentration in the biogas shall not exceed a maximum of 5391 ppmv.
[PTC No. P-030014, 10/17/03]
- 6.3 The permittee shall comply with Permit Condition 2.7.
[PTC No. P-030014, 10/17/03]
- 6.4 The COD reduction of the wastewater in the ADI-BVF anaerobic digester shall be limited to an average 2.0 million pounds per month during any 12-month period.
[PTC No. P-030014, 10/17/03]
- 6.5 The ADI-BVF anaerobic digester flare shall be operated with a pilot flame present at all times during the operation of the digester.
[PTC No. P-030014, 10/17/03]

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- 6.6 As required in PTC No. P-030014, dated October 17, 2003, the permittee shall have developed an O&M manual for the AVI-BVF digester flare that describes the procedures that will be followed to maintain good working order and assure operation as efficiently as practical, in accordance with manufacturer specifications. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-030014, 10/17/03]

- 6.7 Particulate emissions from the waste flare shall not exceed 0.2 lb/100 lb of biogas burned.

[IDAPA 58.01.01.786.01, 4/5/00]

Monitoring & Recordkeeping Requirements

- 6.8 The COD reduced in the ADI-BVF digester shall be monitored and recorded at least once on a monthly basis. Monthly values shall be used to calculate consecutive 12-month averages. A compilation of the most recent five years of data shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. P-030014, 10/17/03]

- 6.9 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a thermocouple or other equivalent device, which detects the presence of the flame. When a pilot flame is not present, the following information shall be recorded in a log: the date, the duration time the flame was not present, the reason the flame was not present, and any corrective action or maintenance taken. A compilation of the most recent five years of data shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. P-030014, 10/17/03]

- 6.10 Prior to October 3, 2003, the permittee shall conduct a compliance test for H₂S as specified in Permit Condition 2.24.

[PTC No. P-030014, 10/17/03]

- 6.11 If the H₂S concentration measured in the initial compliance test is less than or equal to 75% of the concentration limit in Permit Condition 6.2, no further testing shall be required during the permit term. If the H₂S concentration measured during the initial compliance test is greater than 75%, but less than or equal to 90% of the concentration limit in Permit Condition 6.2, a second test shall be required between October 4, 2004, and October 3, 2005. If the H₂S concentration measured during the initial compliance test is greater than 90% of the concentration limit in Permit Condition 6.2, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.06, 09, 5/1/94]

- 6.12 The permittee shall comply with Permit Condition 2.8.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Reporting

- 6.13 Beginning on October 4, 2002, the permittee shall submit a summary compliance report to DEQ every six months for the monitoring required in Permit Conditions 6.8, 6.9, and 6.12. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

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- 6.14 The permittee shall report the results of the performance test required in Permit Condition 6.10 to DEQ in a written report to be received no later than 30 days after completion of the test. If additional performance testing is performed in accordance with Permit Condition 6.11, the permittee shall report the results to DEQ and EPA in a written report to be received no later than 30 days after completion of the test.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

- 6.15 All documents, including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[PTC No. P-030014, 10/17/03]

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7. EMISSIONS UNIT/ETHANOL PRODUCTION PLANT**Summary Description**

The following is a narrative description of the ethanol production plant regulated in this Tier I operating permit. This description is for informational purposes only.

The primary purpose of the ethanol plant (Unit No. S-C-E1) is ethanol production from fermentation of fruit, vegetable, and grain waste. The ethanol plant has a design capacity of 5,000,000 gallons of ethanol per year, and primarily emits VOCs emissions to the atmosphere through fermentation tank vents. The ethanol plant is permitted for construction in PTC No. P-030013, dated October 17, 2003.

The emissions factor used to estimate VOC emissions from ethanol production is taken from EPA Document No. EPA 450/4-90-003. There are currently no controls for emissions from the ethanol production plant.

Table 7.1 contains a summary of the requirements that apply to the ethanol production plant.

Table 7.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
7.1	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; PTC No. P-030013	7.2, 7.3

Permit Limits / Standard Summary

7.1 The permittee shall comply with Permit Condition 2.7.

[PTC No. P-030013, 10/17/03]

Monitoring & Recordkeeping Requirements

7.2 The permittee shall comply with Permit Condition 2.8.

[PTC No. P-030013, 10/17/03]

Reporting

7.3 Beginning on October 4, 2002, the permittee shall submit a summary compliance report to DEQ every six months for the monitoring required in Permit Conditions 7.2. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

7.4 All documents, including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[IDAPA 58.01.01.322.08, 4/5/00]

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8. EMISSIONS UNIT/ETHANOL STORAGE TANKS***Summary Description***

The following is a narrative description of the ethanol storage tanks regulated in this Tier I operating permit. This description is for informational purposes only.

The primary purpose of the ethanol storage tanks is to store ethanol produced in the ethanol plant. There are four 50,000-gallon underground store tanks used to store ethanol, collectively referred to as Unit No. S-C-E2. These units primarily emit VOCs to the atmosphere. Emissions from all four tanks are routed through a 2-inch diameter pipe, extending 52 feet above ground. The ethanol plant is permitted for construction in PTC No. P-030013, dated October 17, 2003.

Emission estimates for the storage tanks are based on the Storage Tank Emissions Calculation Software (version 2.0) distributed by the EPA. The ethanol storage tanks are subject to monitoring requirements under NSPS (40 CFR 60, Subpart Kb).

Table 8.1 contains a summary of the requirements that apply to the ethanol production plant.

Table 8.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
8.1	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; PTC No. P-030013	8.2, 8.5

Permit Limits / Standard Summary

8.1 The permittee shall comply with Permit Condition 2.7.

[PTC No. P-030013, 10/17/03]

Monitoring & Recordkeeping Requirements

8.2 The permittee shall comply with Permit Condition 2.8.

[PTC No. P-030013, 10/17/03]

8.3 For each of the four ethanol storage tanks, the permittee shall maintain records specifying the dimensions of the tank and an analysis showing the capacity of the tank. These records shall be readily accessible, and shall be maintained for the life of the source.

[PTC No. P-030013, 10/17/03]

8.4 For each of the four ethanol storage tanks, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the period of storage. The maximum true vapor pressure of that VOL during the period of storage shall be calculated in accordance with 40 CFR 60.116b(e).

[PTC No. P-030013, 10/17/03]

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Reporting

- 8.5 Beginning on October 4, 2002, the permittee shall submit a summary compliance report to DEQ every six months for the monitoring required in Permit Conditions 8.2 and 8.4. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

- 8.6 The permittee shall report the dimensions of each of the four ethanol storage tanks, and an analysis showing the capacities of each tank to DEQ and EPA prior to December 3, 2002.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

- 8.7 All documents, including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[IDAPA 58.01.01.322.08, 4/5/00]

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9. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 9.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Storage tanks and vessels with less than 260 gallon capacity with appropriate closures	IDAPA 58.01.01.317.01(b)(i)(1)
Storage tanks and vessels with less than 1,100 gallon capacity with appropriate closures, not for use with HAPs, and with a maximum vapor pressure of 550 mmHg	IDAPA 58.01.01.317.01(b)(i)(2)
Unleaded gasoline storage tank and off-specification ethanol storage tank	IDAPA 58.01.01.317.01(b)(i)(3)
Propane storage tank	IDAPA 58.01.01.317.01(b)(i)(4)
Various natural gas-fired air makeup units rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(5)
Various combustion sources rated less than 5 MMBtu/hr, containing less than 0.4% by weight sulfur for coal or less than 1% by weight for other fuels	IDAPA 58.01.01.317.01(b)(i)(6)
Diesel-fired emergency generators rated less than 1 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(7)
Welding using less than 1 T/day	IDAPA 58.01.01.317.01(b)(i)(9)
Ink used to print on packaging using less than 2 gallons per day	IDAPA 58.01.01.317.01(b)(i)(12)
Various water-cooling towers that are non-process-contact coolers and not greater than 10,000 gallons per minute	IDAPA 58.01.01.317.01(b)(i)(13)
Water chlorination less than 20,000,000 gallons per day of water	IDAPA 58.01.01.317.01(b)(i)(16)
Natural gas, propane, or kerosene-fired space heaters rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(18)
Equipment used to exclusively pump, load, and store vegetable oil	IDAPA 58.01.01.317.01(b)(i)(20)
Cleaning and stripping activities and equipment using solutions with less than 1% VOCs by weight	IDAPA 58.01.01.317.01(b)(i)(26)
Storage and handling of water-based lubricants for metal working with an organic content of less than 10%	IDAPA 58.01.01.317.01(b)(i)(27)
Heaters S-C-H4, S-C-H6, S-C-H7, S-C-H8, S-C-H9, S-C-H10, S-C-H11, and S-C-H12	IDAPA 58.01.01.317.01(b)(i)(30)

- 9.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions.

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10. TIER I OPERATING PERMIT GENERAL PROVISIONS***General Compliance***

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action, permit termination, revocation and reissuance, revision, or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code § 39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code § 9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.
[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]
11. Changes that are not addressed or that are prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.
[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (a) by DEQ in accordance with state law; and (b) by the United States or any other person in accordance with federal law.
[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]
13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the CAA or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.
[Idaho Code § 39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

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Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow DEQ, or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit.
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit.
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code § 39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.
- [IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.
- [IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.
- [IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

18. a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.
- [IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

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- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit, including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325, shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a PTC), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
- i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers.
- ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to October 4, 2002.
- iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a).
- iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code § 39-108 and IDAPA 58.01.01.122.

[Idaho Code § 39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99;
40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

20. a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.

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- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

- 21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and EPA as follows:
 - a. Compliance certifications for all emissions units shall be submitted annually beginning October 4, 2003, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
 - b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices.
 - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification.
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information.
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 9.21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred.
 - iv. Such other facts as DEQ may require to determine the compliance status of the source.
 - d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended,
62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

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False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months, beginning on April 4, 2003, for the previous six months. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 3/20/97; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, and as defined in IDAPA 58.01.01.008, an "emergency" constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]